

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

Track Two Cases

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**AMERISOURCEBERGEN DRUG CORPORATION’S
OBJECTIONS AND RESPONSES TO PLAINTIFFS’ (FIRST)
COMBINED DISCOVERY REQUESTS TO DISTRIBUTORS**

Pursuant to Rules 26, 33, and 34 of the Federal Rules of Civil Procedure, Defendant AmerisourceBergen Drug Corporation (“ABDC”), by and through its undersigned counsel, hereby responds to Plaintiffs’ (First) Combined Discovery Requests to Distributors (“Combined Requests”).

GENERAL OBJECTIONS

1. ABDC asserts the following General Objections. Each individual response to the Combined Request is subject to, and limited in accordance with, the following General Objections, which are incorporated therein as if fully set forth. Although specific objections are also interposed in response to individual Combined Requests, in part for clarity, the failure to repeat any part of these General Objections shall not be construed as a waiver of any objection.

2. ABDC objects to the Combined Requests to the extent that they fail to comply with, or seek to alter, the rights and obligations imposed by the Federal Rules of Civil Procedure and/or the Local Rules of the Court, including to the extent that the discovery sought is not proportional to the needs of this case pursuant to Fed. R. Civ. P. 26(b)(1) (as amended effective Dec. 1, 2015).

3. ABDC objects to the Combined Requests to the extent they seek information not relevant to the Track Two Cases, as defined in Judge Polster's Order (Dkt. No. 1218) and/or are inconsistent with Special Master Cohen's Discovery Rulings No. 2 and 3 (Dkt. Nos. 693, 762, 868). Specifically, and consistent with its submission to Special Master Cohen on November 5, 2019, ABDC objects to the Combined Requests to the extent they seek discovery (other than transactional data, suspicious order reports, and policies and procedures) prior to 2006, and "Category Two Discovery" beyond the geographic scope of Cabell County and the City of Huntington.

4. ABDC objects to the Combined Requests to the extent they seek information that is protected from discovery by the attorney-client privilege, the attorney work-product doctrine, Rule 26(b) of the Federal Rules of Civil Procedure relating to trial preparation materials, or is otherwise privileged and/or immune from discovery. This objection includes, but is not limited to, information requested by Plaintiffs that relates to mental impressions, conclusions, opinions, or legal theories of any attorney or representative of ABDC, and such information generated subsequent to the events upon which this lawsuit is based and during or in anticipation of litigation.

5. ABDC objects to the Combined Requests to the extent they seek information and/or documents already in the possession, custody, or control of the Plaintiffs, equally accessible to Plaintiffs, and/or available to Plaintiffs in the public domain. This includes, but is not limited to, information produced by the Drug Enforcement Administration pursuant to the Court's Orders dated April 11, 2018 (Dkt. No. 233) and May 8, 2018 (Dkt. No. 397).

6. ABDC objects to the Combined Requests on the grounds that they contain unwarranted factual and legal conclusions. A response by ABDC shall not be construed as an

admission by ABDC that any factual or legal conclusion or assertion contained in Plaintiffs' Combined Requests is true or accurate. ABDC's responses are not intended to be, and shall not be construed as, an agreement or concurrence with Plaintiffs' characterization of any facts or circumstances contained in those Combined Requests.

7. In providing the following responses to the Combined Requests, ABDC has undertaken a reasonable effort to provide the information requested, to the extent the requested information is not subject to objection. The following responses are based upon such information that is reasonably available to ABDC at this time. ABDC reserves the right to supplement its responses.

8. ABDC objects to the Combined Requests to the extent they seek electronically stored information that is not reasonably accessible because of undue burden or cost, including, to the extent they exist, backup media, storage media from legacy systems, audio recordings, and telephone records.

9. Each of the above objections is incorporated into each response below.

RESERVATION OF RIGHTS

1. ABDC's investigation is ongoing as to all matters referred to in these Combined Responses. ABDC's Objections and Responses reflect its investigation to date. ABDC reserves the right to modify and supplement its Objections and Responses as appropriate.

2. These Objections and Responses are made without in any way waiving or intending to waive: (i) any objections as to the competency, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, of information or documents produced in response to the Combined Requests; (ii) the right to object on any ground to use of the information or documents produced in response to the Combined Requests at any hearings or at trial; (iii) the right to object on any ground at any time to a request for further responses to the Combined

Requests; or (iv) the right at any time to revise, correct, add to, supplement, or clarify any of the objections contained herein.

3. The information and documents provided in response to these Combined Requests are for use in this litigation and for no other purpose. Any production of documents will be subject to the Protective Order (Dkt. No. 441).

COMBINED DISCOVERY REQUESTS re: DISTRIBUTION

Combined Request No. 1. Please produce all transactional data related to the distribution of prescription opioids arising out of CT2 from January 1, 1996, to the present.

RESPONSE:

ABDC incorporates its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the proposed time frame on the grounds that the specified twenty-three year time period is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action.

Subject to and without waiving its objections, ABDC will produce Opioid-related transactional data for Cabell County and the City of Huntington from June 3, 2002 to May 29, 2018 in a format consistent with how the transactional data is maintained by ABDC in the ordinary course of business. ABDC does not have transactional data prior to June 3, 2002 in its possession, custody, or control.

Combined Request No. 2. Please identify in chronological order the title of each Suspicious Order Monitoring System (SOMS) policy in force from January 1, 1996, to the present and produce a copy of the same. After each entry, please identify the Bates range which corresponds to each policy to enable a jury to correlate each policy in your written answer to each document produced.

RESPONSE:

ABDC incorporates herein by reference its General Objections. ABDC further objects to the proposed time frame on the grounds that the specified twenty-three year time period is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action. ABDC further objects to the request to identify the Bates range which corresponds to each policy as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC has produced its Order Monitoring Program policies and procedures in effect during the period from January 1, 1998 to May 29, 2018. The Bates numbers for those policies and procedures are included in Appendix A.

Combined Request No. 3. Please identify each suspicious order you reported to any regulatory body, including the DEA and/or the West Virginia Board of Pharmacy, arising out of CT2 and produce all documents related thereto. After each entry, please identify the Bates range which corresponds to each suspicious order to enable a jury to correlate each suspicious order in your written answer to each document produced.

RESPONSE:

ABDC incorporates its General Objections. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the request to identify the Bates range which corresponds to each suspicious order as the burden to do so

will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, to the extent that it possesses such information, ABDC will produce documents sufficient to identify orders flagged by ABDC's Order Monitoring Program for further review, as well as orders that were determined to be suspicious, from July 1, 2007 to May 29, 2018, relating to its distribution and sale of Opioids in Cabell County and the City of Huntington in West Virginia. Prior to the initiation of its revised Order Monitoring Program in 2007, ABDC reported suspicious orders through means including the use of automated reporting (*see* ABDCMDL00315783), excessive purchase reports (*see, e.g.,* ABDCMDL00316041), and via telephone (*see* ABDCMDL00315783 (letter referencing reporting suspicious orders via telephone)). Following a reasonable investigation, ABDC has not located additional exemplars of the documentation reflecting its reporting of suspicious orders to the DEA during the operation of its 1998 suspicious order monitoring program.

Combined Request No. 4. Please produce the due diligence file for each of your customers in CT2. Please identify the Bates range which corresponds to each due diligence file to enable a jury to correlate each due diligence file to each of your customers.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the request to identify the Bates range which corresponds to each due diligence file as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, ABDC will conduct a reasonable search and produce non-privileged, responsive documents from ABDC's due diligence files for its

customers in Cabell County and the City of Huntington to the extent they exist and can be located.

Combined Request No. 5. Please identify each sales representative(s) responsible for the CT2 territory and produce the custodial file for each. Please identify the Bates range which corresponds to each custodial file to enable a jury to correlate each name in your written answer to each custodial file produced.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the request to identify the Bates range which corresponds to each custodial file as the burden to do so will be substantially the same for ABDC as it will be for Plaintiffs. *See* Federal Rule of Civil Procedure Rule 33(d).

Subject to and without waiving its objections, the following are ABDC sales representatives and district directors responsible for Cabell County and the City of Huntington: Michael Perry, Mike Dailey, and Jill Jackson. ABDC will supplement its response to the extent it discovers additional sales representatives and district directors responsible for Cabell County and the City of Huntington. Further, ABDC requests a meet and confer to discuss which sales representatives and district directors will be added as custodians.

Combined Request No. 6. Please produce all documents in your possession, custody and/or control related to Safescript Pharmacy #6 (DEA# BS8246349) formerly located at 335 Fourth Avenue in Huntington, Cabell County, West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the

extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington.

Subject to and without waiving its objections, ABDC will conduct a reasonable search and produce non-privileged documents responsive to this Combined Request.

Combined Request No. 7. Please produce all documents in your possession, custody and/or control related to Anita T. Dawson, DO (CSL# OD0926) formerly practicing medicine at 1798 Midland Trail, Milton, Cabell County, West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs.

Subject to and without waiving its objections, ABDC has not identified any documents related to Anita T. Dawson, DO. To the extent that ABDC identifies non-privileged documents relating to Anita T. Dawson, DO through its review of agreed-upon custodial files, such documents will be produced.

Combined Request No. 8. Please produce all documents produced to the United States House Energy and Commerce Committee arising out of its investigation into "opioid dumping" into West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC

further objects to the undefined term “investigation” as overbroad, ambiguous, and unduly burdensome. ABDC objects to the characterization of “opioid dumping.” ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC has produced documents responsive to this Combined Request at ABDCMDL00003749-ABDCMDL00004230. ABDC will produce additional documents responsive to this Combined Request to the extent they exist.

Combined Request No. 9. Please produce all documents produced to the West Virginia Attorney General.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC has produced documents responsive to this Combined Request at ABDCMDL00035366-ABDCMDL00037251.

Combined Request No. 10. Please produce all documents related to internal investigations referencing the distribution of prescription opioids in West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC’s distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC’s distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia

that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC requests a meet and confer with Plaintiffs to discuss the scope of this Combined Request.

Combined Request No. 11. Please produce all presentations, including PowerPoints or slide decks, referencing the distribution of prescription opioids in West Virginia.

RESPONSE:

ABDC incorporates herein by reference its General Objections, and limits its response to the time period and geographic scope established by Discovery Ruling Nos. 2 and 3. ABDC further objects to this Combined Request as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of information or documents relevant to any claim or defense in this action to the extent that it is not limited to ABDC's distribution of Opioids to Cabell County or the City of Huntington or, more specifically, ABDC's distribution of Opioids to pharmacies or healthcare providers in Cabell County or the City of Huntington in West Virginia that are alleged to have actually diverted Opioids resulting in purported harm to Plaintiffs. ABDC further objects to the extent this Combined Request does not relate to Cabell County and the City of Huntington.

Subject to and without waiving its objections, ABDC previously produced diversion control presentations, including but not limited to ABDCMDL00036528, ABDCMDL00036547, ABDCMDL00084541, ABDCMDL00144790, ABDCMDL00144876, ABDCMDL00158341, ABDCMDL00158342, ABDCMDL00163878, ABDCMDL00175886, ABDCMDL00281014, ABDCMDL00360064, ABDCMDL00360066, ABDCMDL00360069, ABDCMDL00360080.

Further, ABDC requests a meet and confer with Plaintiffs to discuss the scope of this Combined Request.

Dated: November 29, 2019

Respectfully submitted,

/s Robert A. Nicholas

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CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2019, the foregoing was sent by electronic mail to Counsel for the Plaintiffs and Defendants as follows: mdl2804discovery@motleyrice.com; xALLDEFENDANTS-MDL2804-Service@arnoldporter.com.

/s Robert A. Nicholas

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Appendix A: ABDC Policies & Procedures Produced in the MDL

- ABDCMDL00000011
- ABDCMDL00000013
- ABDCMDL00000019
- ABDCMDL00000024
- ABDCMDL00000026
- ABDCMDL00000029
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